IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA GREENWOOD DIVISION

United States of America, : CR. NO.: 8:18-cr-00412

•

-VS-

: **REQUEST PURSUANT TO**

Catherine Prosser : **FED. R. CRIM. PRO. 16 AND**

Defendant. : BRADY V. MARYLAND

Defendant above named, by and through the undersigned attorney, Lawrence W. Crane, respectfully requests that Julius N. Richardson, Assistant United States Attorney, produce or otherwise make available to the Defense all documents, tangible objects, reports and examinations and tests, witness statements, physical evidence and any other evidence subject to disclosure pursuant the Federal Rules of Criminal Procedure, Rule 16.

Defendant further requests that Assistant United States Attorney Richardson produce all evidence favorable to the Defendant, subject to disclosure by *Brady v. Maryland*, 373 U.S. 83 (1963) and its progeny.

This request is a continuing request for all such discoverable information, as it becomes known to the Assistant United States Attorney or any prosecution agents.

Respectfully submitted,

S/Lawrence W. Crane

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Federal Bar No. 4975

June 11, 2018

Greenville, South Carolina